

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

|                          |   |                       |
|--------------------------|---|-----------------------|
| UNITED STATES OF AMERICA | ) |                       |
|                          | ) | Criminal No. 1:22cr20 |
| v.                       | ) |                       |
|                          | ) | 18 U.S.C. §48         |
| SHEHERYAR KAMRAN,        | ) | (Animal Crushing)     |
|                          | ) |                       |
| Defendant.               | ) |                       |

INDICTMENT

FEBRUARY 2022 TERM -- AT ALEXANDRIA

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

1. In or about the fall of 2021, SHEHERYAR KAMRAN was a 20-year old resident of Reston, Virginia.
2. In or about the fall of 2021, SHEHERYAR KAMRAN purchased hamsters from a pet supply store in Sterling, Virginia, for the purpose of making videos depicting him torturing and killing them. The hamsters were obtained by the pet supply store in Sterling, Virginia, from a source in Georgia.
3. Between in or about September 2021 and November 18, 2021, SHEHERYAR KAMRAN tortured and killed the hamsters that he purchased from the pet supply store in Sterling, Virginia, in the course of making videos to post on Tik-Tok, Instagram, and YouTube.
4. SHEHERYAR KAMRAN named his YouTube account "Killing hamsters click my profile."

4. Between in or about September 2021 and November 18, 2021, SHEHERYAR KAMRAN posted to Tik-Tok, Instagram, and/or YouTube, the following videos depicting him torturing and killing the hamsters that he purchased from the pet supply store in Sterling, Virginia (with the “#” assigned by the Grand Jury to differentiate the videos one from another):

| # | Internet Forum              | Length (seconds) | Activity Depicted in the Video  | Text Overlay of the Video (or Name of File)   |
|---|-----------------------------|------------------|---|---|
| 1 | Instagram                   | 8                | A hamster with black binder clips attached to its body has a pencil inserted into the genital regions twisted back and forth            | (videos_2693960652397768861.mp4)  |
| 2 | Instagram, Tik-Tok, YouTube | 39               | Steaming liquid poured over a hamster in a shoebox scalds and kills the hamster.  | “Gabby petito was R !! !! !! !!”  |
| 3 | Instagram, Tik-Tok, YouTube | 37               | Steaming liquid poured over a hamster in a silver pot scalds and kills the hamster.   | “Brain Laundire Body found on the cameras !! !! !! !! !! !!”  |
| 4 | YouTube                     | 19               | A pencil is used to repeatedly stab a groin and genital area of a hamster in a cardboard box, eliciting an audible response of distress | (yt5s.com-Gabby Petito)   |
| 5 | Instagram, Tik-Tok          | 34               | A pencil is used to repeatedly stab a groin and genital area of a hamster in a cardboard box, eliciting an audible response of distress | “Stabing the v because women deserve it”  |
| 6 | Tik-Tok                     | 25               | A blunt object is used to poke and strike at the groin and genital region of a caged hamster  | “Omg she shifting what a bitch but stab her v then”   |
| 7 | Instagram                   | 142              | A compilation of videos including #2, #3, #5, and #6  | “Brian Laundire Body found on the cameras !! !! !! !! !! !!”<br>“Breaking News!! !! Brain Laundire Note Book Revealed”<br>“Stabing the v because women deserve it”<br>“Gabby petito was R!! !! !! !!” |

5. When contacted by an internet user (“Concerned Citizen”) that KAMRAN believed was trying to ascertain his identity in order to report him to law enforcement authorities, KAMRAN responded by using Instagram direct messaging to send to Concerned Citizen videos depicting him dripping hot wax from a dripping candle onto a hamster, as well as a photo of a

dead hamster with the caption "Killed this one also", and stating that he had many more hamsters.

7. KAMRAN then sent Concerned Citizen a video of a bound naked woman.

COUNT ONE

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. From in or about October 2021 and continuing to on or about November 18, 2021, in Fairfax County in the Eastern District of Virginia and elsewhere, the defendant, SHEHERYAR KAMRAN, did knowingly and unlawfully market, advertise, and distribute an animal crush video, as defined in Section 48(f)(2) of Title 18 of the United States Code, in and using a means or facility of interstate and foreign commerce. In specific, SHEHERYAR KAMRAN posted on Instagram, YouTube, and Tik-Tok the videos identified above as Videos #1, #4, #5, and #7, depicting him impaling hamsters in the genitals, penetrating them with inanimate objects, and subjecting them to serious bodily injury and death, and, in order to get more views for those videos, with text overlays containing words such as "Stabing the v because women deserve it".

(In violation of Title 18, United States Code, Section 48(a)(3).)

COUNT TWO

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. From in or about October 2021 and continuing to on or about November 18, 2021, in Fairfax County in the Eastern District of Virginia, the defendant, SHEHERYAR KAMRAN, did knowingly and unlawfully create an animal crush video, as defined in Section 48(f)(2) of Title 18 of the United States Code, intending and having reason to know that such videos would be distributed in and using a facility of interstate or foreign commerce. In specific, for the purpose of distributing videos on YouTube, Instagram, and Tik-Tok, SHEHERYAR KAMRAN created the videos identified above as Videos #1, #4, #5, and #7, depicting him impaling hamsters in the genitals, penetrating them with inanimate objects, and subjecting them to serious bodily injury and death, and with text overlays containing words such as "Stabing the v because women deserve it".

(In violation of Title 18, United States Code, Section 48(a)(2).)



COUNT THREE

1. The Grand Jury realleges and incorporates by reference the General Allegations listed in this Indictment.

2. From in or about October 2021 and continuing to on or about November 18, 2021, in Fairfax County in the Eastern District of Virginia, the defendant, SHEHERYAR KAMRAN, did purposely and unlawfully engage in animal crushing, in and affecting interstate or foreign commerce. In specific, SHEHERYAR KAMRAN purposely burned, impaled in the genitals, and subjected to serious bodily injury and death hamsters obtained in interstate commerce for the purpose of creating and distributing around the world through the Internet videos of his torturing and killing them, as depicted in the videos identified above as Videos #1, #2, #3, #4, #5, and #7.

(In violation of Title 18, United States Code, Section 48(a)(1).)

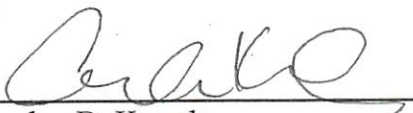
A TRUE BILL:

Pursuant to the E-Government Act,  
The original of this page has been filed  
under seal in the Clerk's Office

FOREPERSON OF THE GRAND JURY

Jessica D. Aber  
United States Attorney

By:

  
Gordon D. Kromberg  
Assistant United States Attorney